

FEDERAL DISTRICT COURT RHODE ISLAND

Docket NO. 19-CV 356

FEDERAL DISTRICT COURT BOSTON
NORFOLK SUPERIOR COURT

Docket NO 1:19-cv-10513-PBS
DOCKET NO 19 0271

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Riaz Hussain Plaintiff 1.
Rani NF Hussain Plaintiff 2.
Plaintiffs

Rhode Island Hospital
Defendant 1

Life Span
Defendant 2

University Orthopedic Inc.
Defendant 3

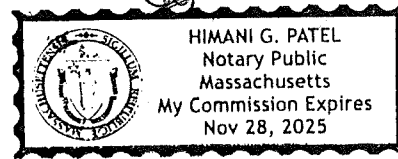
Valentin Antoci, MD
Defendant 4

Andrew R. Evans MD
Defendant 5

Anesthesiologist
Defendant 6

AMENDED COMPLAINT AFFIDAVIT

I Riaz Hussain state under Oath that all the facts and events describe in this Amended Complaint are true to the best of my knowledge



Pursuant to MGL section 60B Chapter 231 title II part III

Plaintiff request the Hon. Court to appoint Tribunal to hear Plaintiff complaint of Mal Practice against the Defendants to determine if the evidence presented and if properly substantiated is sufficient to raise a legitimate question of liability appropriate for judicial inquiry.

This complaint in pursuant to

- (1) Medical Mal Practice
- (2) MGL 93 A
 - I. Non Complaint of Contract
 - II. Deceptive Practices

PARTIESE

1. **Riaz Hussain** hereinafter **Plaintiff 1**, is a resident at 1, Granite Terrace Foxboro MA 02035
2. **Rani NF Hussain** hereinafter Plaintiff 2, is a resident at 1 Granite Terrace Foxboro MA 02035
3. **Plaintiff 1 and Plaintiff 2** are Husband and Wife
Plaintiff 1. has Medicare Health Insurance which pays 80% of all Hospital and Physician Charges.

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4. **Rhode Island Hospital** here in after **Defendant 1 or RIH** is a facility in business of admitting sick and injured patients and providing proper care. RIH accept Medicare Insurance **ADDRESS; - 593 Eddy Street Providence RI 02903 Tel# 401-444-4040**
Defendant employs Residents Physicians for day to day care of in patient.
Attendant's called in for Various Specialties and for Operative Procedures.

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Defendant 1 actively seek patients from neighboring states town in its **Trauma Center** and for other care of patients.

5. **Life Span** hereinafter **Defendant 2** **ADDRESS; - 593 Eddy Street Providence RI 02903 Tel# 401-444-4040**

Is an organization of health care comprising

1. Rhode Island Hospital
2. The Miriam Hospital
3. Bradley Hospital
4. Gateway Healthcare

Defendant 2 employs Residents Physicians for day to day care of in patient.
Attendant's called in for Various Specialties and Operative Procedures.

6. **University Orthopedics Inc.** herein after **Defendant 3 or UO** a group of Orthopedic Surgeons actively seek patients from neighboring town and state Accept Medicare Insurance **Address;- 1 Kettle Point Ave. East Providence RI 02941 Tel# 401-457-1500**

7. **Valentin Antoci MD** hereinafter **Defendant 4 or Attending** in Department of Orthopedic Surgery in Rhode Island Hospital, actively seek patients from neighboring town and state Accept Medicare Insurance, a member of University Orthopedic, Inc. **Address; - 1 Kettle Point Ave. East Providence RI 02941 Tel # 401-457-1500**

8. **Andrew R. Evans MD** hereinafter **Defendant 5** An attending in Department of Orthopedic Surgery in Rhode Island Hospital, actively seek patients from neighboring town and state, Accept Medicare Insurance, a member of University Orthopedic Inc. **Address; - 1 Kettle Point Ave. East Providence RI 02941 Tel# 401-457-1500**

9. **BACKGROUND AND HISTORY OF THE COMPLAINT FILLING IN COURTS**

02/ 27/2019 Plaintiff 1, commenced this action in Norfolk Superior Court against Defendant 1- 5

03/20/2019 case was transferred to Federal District Court Boston based on diversity of citizenship

03/26/2019 On and about Defendant filed a motion to dismiss or transfer to Rhode Island

06/12/2019 Hon. M. Page Kelly Magistrate of Federal District Court Boston Reviewed the case and RECOMMENDED that Defendants Motion to Dismiss or, in the Alternative, Transfer be GRANTED for lack of personal jurisdiction and that the complaint be dismissed without prejudice.

06/27/2019 hand written order by Hon. Judge " *I adopt the report and recommendation and transfer the case to Federal District Court of Rhode Island* "

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BACKGROUND of COMPLAINT of PLAINTIFF 1.

10. 10/26/2018 Plaintiff 1. 82 years old fell off a ladder at his residence sustained HEAD Injury with history of unconsciousness and Compound Fracture of Right Tibial tubercle, brought in by ambulance to Trauma Center of Defendant 1, Rhode Island Hospital Emergency Department, **Cooperative Care Center 3.** **Exhibit 1**

ED Disposition (Emergency Department Disposition)

Plaintiff 1. was evaluated and **admitted** to Orthopedic Surgery page 2 of 3 **Exhibit 1**

11. 10/27/2018 Plaintiff was taken to Operating Room herein after **OR** for Incision and drainage hereinafter **I&D** of right leg Explant and prostulac right total knee. And complex wound closure by **Dr. Andrew R. Evans Assistant Surgeon Dr. Valentin Antoci**

12. Plaintiff 1. did not see Dr. Andrew R. Evens Defndant5 **Pre-operatively** or **Post-operatively**

13. Operative Procedures performed on Plaintiff 1.

- I. Procedure performed by Dr. Andrew R. Evans defendant 5**
 - i. Irrigation and debridement of open right Tibial tubercle fracture
 - ii. Removal/ Explantation of right total knee arthroplasty, tibial component and associated cement with insertion of antibiotic cement spacer
 - iii. Open reduction and provisional fixation right tibial tubercle fracture
 - iv. Primary Closure of traumatic wound. Operating Report **Exhibit 3**
- Plaintiff 1. Never meet or saw Dr. Andrew R. Evans Defendant 5**

- II. 11/1/2018** Plaintiff 1. returned to OR for Revision of Right Total knee arthroplasty by **Dr. Vlaentin Antoci Defendant 4.**

Plaintiff 1. was seen in Holding Area by Dr. Antoci Defendant 4 for Couple of Minutes before going in Operating room. Plaintiff 1. was told by Dr. Antoci what was planned surgery for Plaintiff. No X-ray of Plaintiff Injured knee was shown to Plaintiff 1. **Exhibit 4**

14. COMPLAINT By Plaintiff 1.

Plaintiff 1. Believes there are 3 Essentials Components of Care of a patient undergoing any surgical procedure

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I. **Preoperative** to explain to a patient, Plaintiff 1., what is the problem or Injury he has. Present and show him his X-Ray.

II. **OPERATIVE**, procedure recommended and Alternative.

And consequences.

III. **Post- Operative** Care to ensure patient, Plaintiff Full recovery, final Discharge.

15. **PRE OPERATIVE CARE BY DEFENDANT 1& 2**
No Comments

16. **PRE OPERATIVE CARE BY DEFENDANT 4 Dr. ANTOCI**

11/1/2018 Plaintiff 1. returned to OR for Revision of Right Total knee arthroplasty by Dr. Antoci Defendant 4. Plaintiff 1. was seen by Dr. Antoci for Couple of Minutes before going in Operating room to sign Consent. Plaintiff 1. was told by Dr. Antoci briefly what was planned surgery for Plaintiff 1.. **Again Plaintiff 1. was not shown X-ray of Injured knee.**

- i. No Possible Complication was discussed
- ii. Including Possible A-Vascular Necrosis of Avulsed Tibial Tubercle

i. **PRE OPERATIVE CARE BY DEFENDANT 5 Dr. Andrew R. Evans**
Plaintiff 1. **did not see DEFENDANT 5 Dr. Andrew R. Evans**, pre-operatively.

Plaintiff Never meet Dr. Andrew R. Evans Defendant 5

17. **POST OPERATIVE CARE IN RIH.** By Defendants 1,2,3,4 and 5

18. POST Operative Care by Defendants 1 & 2

- I. Response to Patient and Plaintiff 1. Requests for help and assistant while in RIH were poor to say the least Sometime Plaintiff has to wait for 2 Hours. **Exhibit 6**
See Patient Survey

- II. **PHYSIOTHERAPY**

11/2/2019 Plaintiff 1. Was seen by Physiotherapist for few Minutes who visited Plaintiff 1. To explain to Plaintiff 1. How to walk

Before Physiotherapist finishes his presentation and instructions he received a telephone call on his cell Phone. Physiotherapist left before completing his instructions with a promise to come back. **Physiotherapist never returned to complete his Instructions.**

19. HISTORY of Plaintiff 1. Discharge from RIH Defendant 1 facility.

- I. **11/3/2018** Plaintiff was being discharge from Rhode Island Hospital On Plaintiff 1. Request Plaintiff 1. Was discharge to a skilled nursing facility **Life Care Center of Attleboro**, With a postoperative instructions **Exhibit 5**
- II. **To be noted Plaintiff 1. does not recall receiving a Physician examination Prior to Discharge from RIH**

20. Patient (Plaintiff) Survey

Exhibit 6

- III. **CNA (Certified Nurses Aid)** taking Vital Signs of Plaintiff 1. Prior to Discharge from RIH, Defendant1 recorded **Plaintiff 1. temp. 101.5F** she did not recorded in the charts of Plaintiff 1. and did not believe nor did she accept the Temperature readings.
- IV. **CNA** change, to another Digital Thermometer which also recorded Plaintiff temperature 101.5F she did not believe nor accepted the temperature reading nor did she recorded the temperature reading in Plaintiff 1. Medical record.
- V. **CNA** brought another Thermometer dipped in water and inserted in Plaintiff 1. mouth which recorded Plaintiff 1. **Temp 99.1 F.** which **CNA** accepted and recorded. **Exhibit 5 Page8**

21.Discharging Provider IK MD

Provider who will follow patient (Plaintiff 1.) After Discharge

Valentine Anttoci MD 1, Kettle Point Ave. East Providence RI 02914.Tel.# 401-457-1500

ASSESSMENT & Plan 82 Yrs. o. male s/p right revision total knee arthroplasty POD#1

Doing well this am, no acute concern.

22. POST Operative Care by Defendants 3,4 & 5

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While Plaintiff 1. was in RIH.

- i. Attending Dr. Antoci Defendant 4 did not see Plaintiff 1., post operatively.
- ii. Dr. Andrew R. Evans Defendat5 did not see Plaintiff 1., post operatively while Plaintiff1. was in RIH.

Plaintiff 1. did not receive any information's by Defendants, what was encountered during Operation

What procedure was done, its possible success, any complications there off.

Plaintiff 1. was worried about possibility of A Vascular Necrosis of Avulsed Tibial tubercle

23. 11/3/2018 ADMISSION to LIFE CARE CENTER OF ATTLEBORO

Exhibit 7

Note able Examination by ADMITTING Physician

- I. Temperature greater than 101°F
- II. Respiratory few rales left base and mild productive cough chest X-Ray ordered

11/6/2018 PROGRESS NOTES

"He was found to have Pneumonia" started on I/V Zosyn for Hospital acquired pneumonia.

Respiratory few rales at left base

11/09/2018 A febrile
Respiratory few rales at left base.

11/12/2018 He also had fever last night
Respiratory few rales at left base

11/15/2018 Respiratory few rales at left base

11/19/2018 Respiratory minimal rales at left base.

11/23/2018 Respiratory minimal rales at left base.
When patient arrived he had elevated temperature 101.2° he also had a cough
Chest x-ray was obtained which showed left lower lobe pneumonia.

11/23/2018 Plaintiff was discharged from LIFE CARE CENTER OF ATTLEBORO

24. PLAINTIFF POSTOPERATIVE CARE by ATTENDING Dr. ANTOCI in RIH and in his OFFICE Continued.

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- I. **Post Operatively Plaintiff 1.** was not seen by **Attending Dr. Antoci Defendant 4**, while Plaintiff 1. was in RIH nor at the time of discharge from RIH.
- II. **11/3/2018** Plaintiff 1. was discharged from Rhode Island Hospital with elevated Temperature **101.2°** **he also had a cough.**
- III. **Discharging A Patient** with elevated temperature **101.2°** and cough is a serious **ERROR**
- IV. **Discharging a Patient** from Hospital, with elevated temperature **101.2°** and Pneumonia with a major extremity fracture is amount to Possible **DEMISE** and **DEATH**.
- V. When patient arrived at Life Care Center of Attleboro Plaintiff 1. had elevated Temperature **101.2°** he also had a cough **Chest x-ray was obtained which showed left lower lobe pneumonia**
- VI. **DEFENDANT'S SUBJECTED PLAINTIFF 1. TO A SERIOUS COMPLICATIONS of Pneumonia AND POSSIBLE DEATH.**
- VII. **Defendant's did not care about Plaintiff 1. Elevated temperature.**

25. PLAINTIFF'S 1. POST OPERATIVE CARE IN Dr. Antoci Office Defendant 4

- I. **Plaintiff 1. was given 1st. Appointment to see Dr. Antoci Defendant 4 at his office on 11/19/2018 at 1598 S. County Trail E. Greenwich RI**
Exhibit 8

Where Plaintiff 1. was seen by A **PA named Danielle**
PA Danielle, she changed Plaintiff 1. Splint from a simple wire padded splint to a Mechanically Controlled Splint and **she told Plaintiff 1..**

- i. You have Prosthesis with a Hinge
- ii. You will need another Definitive Surgery for Permanent Prosthesis
- iii. **This was shocking news to Plaintiff 1.**

- iv. Plaintiff 1. told PA Danielle to call Dr. Antoci Defendant 4, and confirm
- v. PA Danielle called Dr. Antoci and confirmed Plaintiff 1. does not need another Definitive Surgery.

II. Plaintiff 1. received 2nd Appointment to see Dr. Antoci Defendant 4 at his office on 12/21/2018 @ 2:45 PM

Exhibit 9

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On 12/21/2018 @2:45 PM at 1, Kettle Point Ave. East Providence RI
Where Plaintiff 1. saw Dr. Antoci Defendant 4, first time Post Operatively.
Plaintiff 1. complained to Dr. Antoci that

- i. Plaintiff 1. never saw you Post Operatively
Dr. Antoci Response;- I am very Busy, I leave home 5AM and return at 9PM That is why I am still single, Plaintiff offered to Dr. Antoci to introduce to him some girl , Dr. Antoci gave Plaintiff 1. his Cell Phone number for Contact.
- ii. No One Explained to Plaintiff 1. what was done in Operation.
- iii. No One Explained to Plaintiff 1. How Did The Operation Go.
- iv. Any Complications Plaintiff 1. may expect
- v. Possibility of **A vascular Necrosis of Avulsed Tibial Tubercle worried Plaintiff 1.**
- vi. Plaintiff 1. was Discharged from RIH with Temperature of 1:5F
- vii. Plaintiff 1. was Discharged from RIH with Pneumonia
- viii. Discharging 82 Years old with Major Extremity Fracture Post Operatively Is subjecting him to **possible Demise and Death**

Dr. Antoci response to i-viii. "I am sorry"

- ix. Dr. Antoci showed Plaintiff 1. **On Plaintiff 1. Request picture of Operative Procedure**
 And gave him Physiotherapy Referral.

Exhibit 11

Plaintiff 1. was advised by Dr. Antoci that Physiotherapist will decide When Plaintiff 1. can walk without Cane and able to drive.

A SURPRISE FOR PLIANIFF 1.

Surgeon Responsibility is being shifted to Physiotherapist

- x. Plaintiff 1. discussed with Dr. Antoci Balance due from Plaintiff 1.
 And Dr. Antoci said **"do not worry, He will take care of it"**
- xi. Plaintiff 1. Received Another Office appointment on **2/15/2019** **Exhibit 10**

During this interval Plaintiff 1. received Physiotherapy at home. Physiotherapist visited Plaintiff 1. home once a week.

Plaintiff 1. asked Physiotherapist when he can drive; Physiotherapist said it is up to Dr.

Antoci Yours Surgeon, Not up to Physiotherapist.

Plaintiff 1. Made an Appointment at Physiotherapy Services by **Mass. General Hospital (MGH)** at Patriot Place Foxboro and attended few Physiotherapy sessions at **Mass. General Hospital (MGH)** at Patriot Place Foxboro and ask the Physiotherapist if Plaintiff 1. could drive.

Physiotherapist said it is up to **Dr. Antoci**, your Surgeon, However she promised to call **Dr.**

Antoci.

Physiotherapist at **Mass. General Hospital (MGH)** at Patriot Place Foxboro told Plaintiff 1. that she called Dr. Antoci couple of time but **has not received any call back from Dr. Antoci.**

Exhibit 12

I. Plaintiff 1. 3rd Office Appointment with Dr. Antoci

Plaintiff 1. arrived at University Orthopedics 1, Kettle Point Ave. east providence at 2 PM On 02/15/2019 and was Told by the receptionist that Plaintiff 1. could not see Dr. Antoci Until the Balance is paid and cleared.

Plaintiff1. told the Receptionist That Dr. Antoci has agreed to Clear the balance, but of no avail.

This is denying Plaintiff (Patient) Post-Operative care **The 3rd Component of**

SURGERY Incomplete Care by Dr. Antoci Defendant 4

An Unethical in Appropriate and Deceptive action by Dr. Antoci Defendant 4.

Plaintiff was left in Limbo.

Not Honoring Promised To take care of Balance due from plaintiff.

However One should Not expect Payment before All and the Complete services are rendered

26. Defendant 6 (Anesthesiologist) name not available

Plaintiff 1. Believes

- I. That Defendant 6 an Anesthesiologist, introduce Bacteria causing Plaintiff 1. To have Pneumonia Postoperatively so soon after surgery.
- II. **Endotracheal tube** used during intubation and lubricant, must be contaminated with bacteria to cause Plaintiff 1. Pneumonia so soon after surgery.
- III. **This is break down of Proper un contaminated Intubation.**

27. REASON FOR RELIEF

- I. Attending Surgeon Dr. Antoci Defendant 4, not seeing and checking post operatively and before Discharging from Hospital is in appropriate and irresponsible act and amount to poor to None performance 3rd Component of Surgery.
- II. Discharging A Patient with elevated temperature 101.2° and cough is a serious ERROR by Defendants.
- III. Discharging a Patient with elevated temperature 101.2° and Pneumonia with a major Extremity fracture is subjecting Plaintiff 1. to possible DEMISE
- IV. DEFENDANT'S Discharging Plaintiff 1. from Hospital, SUBJECTED PLAINTIFF 1. TO A SERIOUS COMPLICATIONS AND POSSIBLE HIS DEMISE.
- V. Contaminated Intubation by **Anesthesiologist** is more likely source of infecting organism to cause Pneumonia in Plaintiff 1.
- VI. If care and treatment at Life Care Center of Attleboro was not at Best
Plaintiff was expected to demise.
- VII. Post-Operative Care in Hospital and in Office is an Obligation of Attending surgeon and part of essential Component of Any and All Surgeries.
- VIII. Subjecting Plaintiff 1. to PA Danielle, with in-adequate knowledge and training Is inappropriate and unfair practice and improper in-adequate care.
- IX. Giving an appointment on 2/15/2019 and not Honoring is Denying Plaintiff 1. Post-Operative Care is in-complete Care and Unfair Practice.
- X. Refusing to see Plaintiff on 2/15/2019 is Improper, Unethical, amount to poor and in-complete post-operative care and Unfair Practice.
- XI. This action of Dr. Antoci Defendant 3. left Plaintiff in Limbo
- XII. Consequence Hospital Acquired Pneumonia has left Plaintiff 1.

- i. Plaintiff health has been deteriorating rapidly
- ii. Feeling weak and unable to perform normal daily chores
- iii. Plaintiff loves Gardening, since Pneumonia unable to enjoy Gardening
- iv. Increasingly feeling Dyspnea and wheezing
- v. Loss of Consortium.
- vi. Significant loss of Memory

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28. Pleading of Plaintiff 2

- i. Plaintiff 2. is suffering the effects of Plaintiff 1 sufferings ,
Being a Wife and Life Partner.
- ii. Plaintiff 2 is being deprived of all the benefits and enjoyment of healthy husband

29. PRAYERS FOR RELIEF by Plaintiff 1.

1. COMPENSATORY RELIEF

- I. **No Amount of Money or Financial Compensation can bring back**
Good health of Plaintiff 1.
- II. Plaintiff 1. pray to the Hon. Court to hold **All Defendant's** responsible for serious Errors of Pre-Operative Intra operative and Post-Operative care.
And lack of adequate care of Plaintiff 1. in Hospital and in Out-patient (Office)
- III. Plaintiff 1. pray that Hon. Court hold **All Defendant's** responsible for discharging Plaintiff 1. with Pneumonia and High temperature is a Serious Error by Defendant's.
- IV. Plaintiff 1. pray that Hon. Court hold Dr. Antoci Defendant 4 refusing to see Plaintiff 1. was an inappropriate act and **In-complete Post-Operative Care.**

V. Plaintiff 1. pray that Hon. Court hold the Defendant's has been more than adequately paid for poor care and performance and do not deserve any more payments of balance due from Plaintiff 1.

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VI. Plaintiff 1. prays to Hon. Court to grant **Compensatory relief of 5, Million Dollars from Each Defendant Total of 30 Million** for subjecting Plaintiff 1. to such a serious complication of Discharging from Hospital with Pneumonia a Life Threatening condition and inadequate Post-Operative care.

2. PUNITIVE RELIEF

Plaintiff 1. Pray that Hon. Court will award Plaintiff 1 Punitive Relief **10 Times the Compensatory Relief as per rules and regulation.**

30. Relief sought by Plaintiff 2

1. COMPENSATORY RELIEF

VII. Plaintiff 2. Is Sufferings from poor health of Plaintiff 1. And all its consequences.

And request Hon. Court to grant additional and separate relief to Plaintiff 2. Of same amount as may be granted to Plaintiff 1. (\$30 Million, 5 Million Dollars from each defendant.)

2. Plaintiff 2. Pray that Hon. Court will award Plaintiff 2. Punitive Relief **10 Times the Compensatory Relief as per rules and regulation**

31. Plaintiffs request trial by Jury

Respectfully Submitted

Riaz Hussain

Rani NF Hussain

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Plaintiff Pro Se

1, Granite Terrace

Foxboro MA 02035

Tel# 508-308-4444

JULY 5TH . 2019

VERIFICATION UNDER OATH

Plaintiff1. I SOLEMNLY STATE UNDER OATH THAT I AM a retired General Surgeon and very familiar with any all operative procedures care . Plaintiff 1. Request Hon. Court that all the Statement made by Plaintiff 1. In his complaint be regarded as made UNDER OATH AND by an Expert Witness .

Both Plaintiffs, Plaintiff 1. And Plaintiff 2. here in state that we have read the allegations set forth in this Complaint and that they are true based upon Our personal knowledge.

Dated: July 5, 2019



Plaintiff 1.

Riaz Hussain, pro se

RANI NF HUSSAIN / Riaz NF Hussain

Commonwealth of Massachusetts

County of Norfolk

On this 5 day of July, 2019 before me , the undersigned notary public, personally appeared

RIAZ HUSSAIN who is personally known to me or proved to me through satisfactory evidence of identification which was Massachusetts DL to be the person whose name is signed on the preceding or attached document , and acknowledged to me that he/she signed it voluntarily for its stated purpose.



My Commission Expires

NOV 28, 2025

